

Bradley John Puetz
d/b/a Desert Tactical
10410 Apples Eye Street
Las Vegas, NV 89131
Tel:(702)625-3822
brad@deserttactical.com
Plaintiff
Pro Se

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

BRADLEY J. PUETZ d/b/a DESERT
TACTICAL

Plaintiff,

v.

TEESPRING.COM, INC., A Delaware
Corporation; DOES I-X, ROE
CORPORATIONS I-X, inclusive

Defendant.

2:17-cv-02519-MMD-GWF

COMPLAINT

Judge: TBD

**FIRST COMPLAINT FOR COPYRIGHT INFRINGEMENT, CONTRIBUTORY
COPYRIGHT INFRINGEMENT, AND VICARIOUS COPYRIGHT INFRINGEMENT
AGAINST TEESPRING, INC.**

COMES NOW, Plaintiff Bradley J. Puetz (hereinafter as "Puetz" or "Plaintiff") d/b/a
Desert Tactical, and files this Complaint against Teespring, Inc. (hereinafter as "Teespring" or
"Defendant") and alleges as follows:

1
2
3
4
5
6
7
8
COMPLAINT

9 This is an action for copyright infringement, contributory copyright infringement, and
10 vicarious copyright infringement relating to the Plaintiff's copyrighted artwork titled "I'm the
11 Infidel Allah Warned You About" (hereinafter as "Puetz design") and the unlawful commercial
12 misappropriation of the Plaintiff's intellectual property by Teespring and its users in violation of
13 Puetz's exclusive rights under 17 U.S.C. §1308(1), (2).

14
15
16
17
18
19
20
21
22
THE PARTIES

23 1. Plaintiff Bradley J. Puetz, d/b/a Desert Tactical, is a sole-proprietorship located at
24 10410 Apples Eye Street, Las Vegas, Nevada 89131.

25 2. Upon information and belief, Defendant Teespring, Inc. is a Delaware corporation
26 with a principle office located at 460 Bryant Street, Suite 200, San Francisco, California 94107.

27
28
JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction because this litigation arises under
federal law, specifically but not limited to, 17 U.S.C. §101 et seq. (Copyright Act). Jurisdiction in
this Court is proper pursuant to 28 U.S.C. §1331 (federal question) and 28 U.S.C. §1338(a)
(copyright).

4. This Court also has personal jurisdiction because the Plaintiff is being injured in
this forum and the Defendant markets and targets customers in this forum to purchase its
infringing products. Defendant has purposely availed itself of the privilege of doing business in
this forum by conducting business within the State of Nevada and within this judicial district.

5. Venue in this Court is proper pursuant to 28 U.S.C. 1391(b) and (c).

6. Venue in this Court is proper pursuant to 28 U.S.C. 1332(a) (diversity).

BACKGROUND

7. Established in 2008, Desert Tactical has developed and branded its own line of
apparel and tactical equipment providing unique and top quality products to customers. Desert

Tactical's designs are essential to its growth and longevity while innovating new graphics and prototypes in outdoor recreational equipment to retain and attract new customers. Desert Tactical believes it is imperative to contract, research, and limit every company that manufactures, prints, or packages any and all products that carry the Desert Tactical brand name. This serves to ensure the customer is guaranteed an exceptional quality product every time. Desert Tactical does not drop ship or use third party agents for any products delivered direct to customers bearing their brand without a quality control inspection. When Desert Tactical affixes their brand logo to any artwork or product the public should assume that all products have been inspected to ensure each item is a professionally designed, manufactured, and printed product.

8. In connection with the activities and products described in the preceding paragraphs, Plaintiff is the owner of the following federally registered copyright:

- a. "TM THE INFIDEL ALLAH WARNED YOU ABOUT" - Bearing registration Number VA 1-967-093 and registered with the U.S. Copyright Office on June 7th, 2015 with first published rights on December 1st, 2014 primarily for use on apparel.

Copy attached hereto as Exhibit A.

9. On or about December 8, 2014, Puetz created the "I'm the Infidel Allah Warned You About" design (hereinafter as "Desert Tactical design") which specifically incorporates the following unique features:

- a. An image of a human skull facing directly forward with a lowered brow and narrowed eye sockets to give the impression that the skull is angered or somewhat menacing in appearance. The skull is white in color and includes lines and shapes to show texture, shading and depth of the eye sockets, temporal, and lower frontal portion of the skull. The skull additionally has fissure lines (cracks) to add to the detail of the image.
- b. An image of an American flag worn as a bandana covering the nose and mouth of the skull. The flag is oriented in traditional form with the field of stars on the left. The flag has an appearance of being slightly wrinkled and contoured around the face. The flag is depicted in proper red, white, and blue colors.
- c. The Arabic word "Kafir" (translates to English as "infidel" or "non-believer") depicted on the forehead portion of the skull. The Arabic writing is depicted in the informal script form and appears spray painted or brush

1 painted with runs in the paint. The script appears primarily in red but also
2 may appear in black or background color.

- 3 d. The phrase "I'M THE INFIDEL ALLAH WARNED YOU ABOUT" is
4 depicted in all capital letters and has a distressed or weathered appearance.
5 The words I'M THE INFIDEL are arched over the top portion of the skull
6 and ALLAH WARNED YOU ABOUT arched underneath the skull. The
7 lettering primarily appears in red but may appear in other colors depending
8 on the background color the image is placed on.

9
10 10. The Desert Tactical design as filed with the United States Copyright Office is
11 depicted below.



23 11. The Certificate of Registration is *prima facie* evidence of the validity of the
24 registered copyright, Puetz's ownership of the registered copyright, and the exclusive right to use
25 the copyrighted artwork in connection with the production of goods with the design specified in
26 the certificate enumerated above.

27 12. Plaintiff began producing and selling items of apparel bearing the Desert Tactical
28 design around February 14, 2015.

1 13. Defendant is engaged in the business of printing and selling apparel, mainly t-
2 shirts, with a variety of designs. Teespring operates and maintains a website (teespring.com) that
3 provides tools for its customers (hereinafter as “users”) to potentially design and upload
4 infringing and/or counterfeit designs.

5 14. User's designs are uploaded or created online using proprietary tools provided by
6 the Defendant on their exclusive website, www.teespring.com. According to Teespring's website,
7 “Teespring is a platform that makes it easy for anyone to create and sell high-quality products
8 people love, with no cost or risk.” Customers are encouraged to “Just design a shirt in our easy
9 designer, set a price, add a goal and start selling!”

10 15. Users can initiate a sales “campaign” on the Teespring website and set parameters
11 such as the quantity of the uploaded design they wish to sell, types of apparel, colors, and the
12 duration of campaign. Once these parameters are set, the item is then immediately launched live
13 on teespring.com for sale to the public.

14 16. Items of apparel are not printed with the uploaded design until the quantity
15 indicated by the user is sold, this is known as the “goal”. Once the goal is met, Teespring then
16 prints the apparel with the user's uploaded design and ships them to its customers. Campaigns that
17 do not meet the sales goals are not produced or printed.

18 17. Teespring was successfully sued by Puetz for copyright infringement and vicarious
19 copyright infringement of this same design in the U.S. District Court for the Northern District of
20 California. Judgment in favor of Puetz was entered on May 19, 2017 in case number 3:15-cv-
21 04149-VC. Copy attached hereto as Exhibit B.

22 18. Plaintiff has discovered identical or substantially similar designs being offered for
23 sale on teespring.com on no less than four separate occasions between June 14, 2017 and
24 September 9, 2017 and after entry of judgment in the aforementioned litigation.

25 19. Teespring is well aware of the exclusive rights held by Puetz to the Desert Tactical
26 design and substantially similar versions thereof.

27 20. Teespring's infringement of the Plaintiff's design is ongoing in nature.
28

1 21. On June 14, 2017, the Plaintiff became aware that Teespring was again engaging
2 in advertising, manufacturing, and selling apparel with a copyright infringing replica of the Desert
3 Tactical design affixed which was a direct infringement on Plaintiff's copyrighted design. Puetz
4 became aware of the activity via a simple search of the words "Allah warned" on teespring.com.
5 The search result produced the campaign bearing the infringing design. Attached hereto as
6 Exhibit C.

7 22. Teespring's counsel of record at the time, Naomi Jane Gray (hereinafter as "Gray")
8 was notified via email of the infringing campaign on June 14, 2017. Teespring removed the
9 campaign from teespring.com within 24 hours of the notification.

10 23. On July 11, 2017, Plaintiff again searched the teespring.com with the term "Allah
11 warned" and again teespring.com returned an active campaign engaging in the sales of the
12 identical infringing design. Attached hereto as Exhibit D.

13 24. On June 11th, 2017, Puetz emailed Gray notifying them that a campaign on
14 teespring.com was again infringing on the Desert Tactical design. Puetz received no reply.

15 25. On July 12, 2017, Puetz emailed Teespring's Legal department a formal Final
16 Cease and Desist letter indicating that Teespring was no longer entitled to further notice of
17 infringing designs being offered on the Teespring platform. Copy attached hereto as Exhibit E.

18 26. Despite having received several notices from Puetz, the Defendant has continued
19 to solicit orders for, manufacture, sell, and ship articles of apparel bearing designs infringing upon
20 the Desert Tactical copyright.

21 27. On September 9, 2017, Puetz again did a search query on teespring.com which
22 returned yet another active campaign titled "I'm the Infidel" with a design infringing upon the
23 Plaintiff's copyright. Copy attached hereto as Exhibit F.

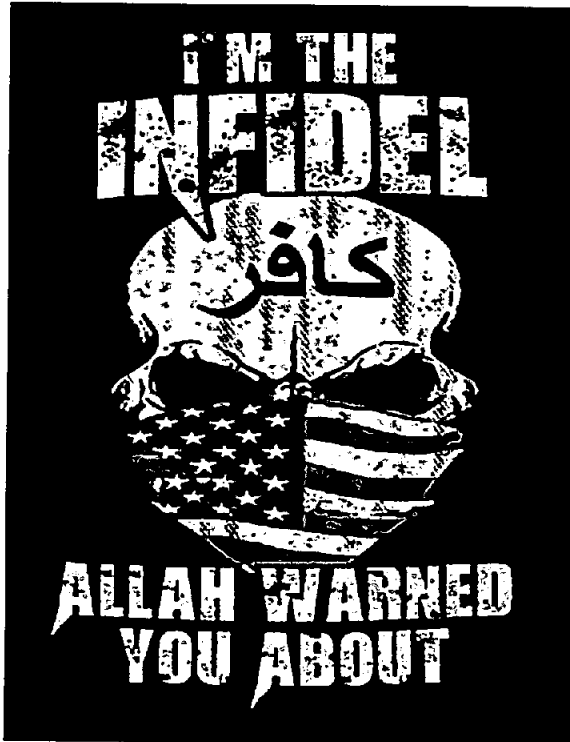
24 28. On September 10, 2017, Puetz had an associate place an order on Teespring for a
25 men's Hanes Tagless t-shirt bearing the infringing design. Teespring then proceeded to print the
26 shirt, package and ship the t-shirt to the Plaintiff's associate in Las Vegas, Nevada. Teespring
27 subsequently billed Puetz's associate \$35.97 for the t-shirt. Copy attached hereto as Exhibit G.
28

29. On September 14, 2017, Puetz received the t-shirt from Teespring at an address in Las Vegas, NV. Copy attached hereto as Exhibit H.

30. The t-shirt Puetz received is depicted in Exhibit I attached hereto.

31. The shirt purchased from teespring.com is shown with the Desert Tactical design t-shirt below.

Teespring Shirt



Desert Tactical Shirt



32. At no time has Mr. Puetz issued a license to Teespring, its users, or any other party to produce, market, sell, or distribute its copyrighted products or designs.

33. The copyrighted artwork set forth is indisputably protected by the certificate provided and thus conclusive evidence of the validity of Plaintiff's claims of exclusive rights under Title 17 U.S.C. §1308 as set forth in this Complaint.

34. Defendant's unauthorized use of Puetz's copyrighted design is commercial in nature and is intended to, and will, directly compete with the lawful production, sale, distribution and advertising activities of Desert Tactical.

INFRINGEMENT OF REGISTERED COPYRIGHT UNDER 17 U.S.C. §102(a)(5)

37. Teespring provides proprietary tools and software for customers to upload, create, and offer for sale designs that are potentially infringing and/or counterfeit.

38. Teespring has continuously failed to identify, isolate, intercept, or otherwise prevent infringing or counterfeit designs from going live on teespring.com.

39. Teespring, Inc. owns and maintains the website www.teespring.com, a website infringing and counterfeit designs are currently offered for sale.

40. Teespring published, advertised, and offered for sale on [teespring.com](https://www.teespring.com) tangible emblazoned with designs infringing upon the Desert Tactical copyright.

41. Plaintiff at no time has issued Teespring or its user(s) a license or permission to
 y, publish, offer for sale, or sell items emblazoned with images infringing upon the Desert
 ul design.

42. Teespring knew or should have known that items being offered on their website were infringing on the Plaintiff's rights given the notices provided by Puetz.

43. Defendant is acting with full knowledge that designs being repetitiously offered on www.etsy.com are the intellectual property of Puetz and are protected by U.S. Copyright Law.

44. Defendant has willfully disregarding multiple notices sent by Puetz to immediately permanently discontinue offering for sale items bearing designs that infringe upon the fully registered copyright of Puetz.

45. Teespring nor its users, affiliates, or other such entities have been given permission to publish, display, disseminate, or otherwise reproduce the Desert Tactical design.

46. Teespring and its user are jointly responsible for the uploading of the infringing design, advertising, promoting, offering for sale, manufacturing, shipping, delivering, billing, and profiting from apparel bearing the design in controversy and directly infringing upon Puetz's federally registered copyright.

47. Teespring and its user are jointly and severally liable for damages incurred by Puetz as a result of the cooperative infringement of the Plaintiff's copyright.

48. Desert Tactical's designs are of great value and are among its top sellers with the highest profit margins. Puetz continues to be injured by the Defendant's unauthorized offering to manufacture, manufacturing, selling, and shipping of infringing merchandise.

49. Desert Tactical is entitled to a permanent injunction against Teespring and its user(s) involved in this infringement action, as well as all other remedies available under Title 17 U.S.C. §502, §504 and §505.

50. Plaintiff continues to be injured by the Defendant's unauthorized publishing, advertising, offering for sale, offering to manufacture, manufacturing, selling, and shipping of infringing merchandise after being ordered to Cease and Desist by Puetz.

COUNT TWO

CONTRIBUTORY COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. §106, §113(a)

51. Paragraphs 1 through 50 are incorporated by reference as if fully set forth herein.

52. Based upon previous litigation regarding copyright infringement of the Desert Tactical design, Teespring has direct knowledge or should have direct knowledge that designs being offered for sale on teespring.com are continuing to infringe the Plaintiff's exclusive rights under 17 U.S.C. §106 *et seq.*

53. Teespring provides a platform and audience for user created campaigns in which the public can purchase items bearing images and designs created by said users.

54. Teespring provides its users proprietary software in which customers can create, design, modify, and upload images and designs to teespring.com as part of a campaign to offer items of apparel emblazoned with such designs for sale to the public for profit.

55. Upon information and belief, Teespring claims that it has incorporated a system that screens, scrutinizes, or otherwise inspects designs uploaded to its platform by users. This system is clearly inadequate demonstrated by its repetitive failure to deny users the ability to upload and launch campaigns bearing infringing versions of the Desert Tactical design.

56. Teespring should have the ability to properly distinguish infringing designs from non-infringing designs prior to being published and offered for sale to the public on teespring.com.

57. Teespring and its user(s) have realized unjust profits, gains, and advantages as a proximate result of such infringement.

58. Teespring and its user(s) are jointly and severally liable for damages to the Plaintiff based on the cooperative nature of infringement of the Plaintiff's copyrighted design.

COUNT THREE

VICARIOUS COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. §106, §113(a)

59. Paragraphs 1 through 58 are incorporated by reference as if fully set forth herein.

60. Teespring provides tools and software for customers to upload, promote, and offer for sale designs that are potentially infringing and/or counterfeit designs.

61. Teespring, Inc. owns and maintains the website www.teespring.com, a website where infringing and counterfeit designs are currently offered for sale.

62. Teespring had knowledge that items being offered for sale on their website were infringing on the Plaintiff's rights given the numerous notices provided by the Plaintiff.

63. Teespring has and maintains ultimate control over the content of its website.

64. Teespring has the right and ability to control the content of its exclusive website, including, but not limited to, designs created and uploaded to teespring.com for purposes of being offered for sale to the public.

65. Teespring directly advertises, publishes, manufactures, prints, distributes, and promotes the sale of apparel emblazoned with designs that infringe upon the Plaintiff's copyright.

66. Teespring has benefited financially from the sale of items bearing the design infringing upon the Plaintiff's copyright design.

67. Teespring has repeatedly and willfully chosen to ignore or disregard claim of copyright ownership by the lawful registrants by continuing to advertise, offer for sale, manufacture, distribute, and promote even after registrant had notified Teespring of infringing and potentially infringing items multiple times.

68. Teespring continues to fail to take appropriate action upon being repeatedly notified by the Plaintiff about recurring infringing designs being offered for sale on teespring.com.

69. Teespring is well aware that Puetz is the lawful owner of the registered copyrighted Desert Tactical design.

70. Teespring has acted with knowledge of Puetz's ownership and with deliberate, willful intention to trade upon the consumer designs that infringe upon Puetz's federally registered copyright.

71. Teespring's infringing use of Desert Tactical's copyright design is repetitious and ongoing in nature.

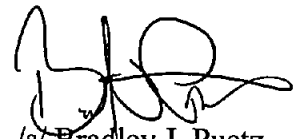
72. Desert Tactical is entitled to a permanent injunction against Teespring and its user(s), as well as other remedies available under 17 U.S.C. §504, including but not limited to, compensatory damages, statutory damages, disgorgement of profits, costs, and attorneys' fees.

PRAYER FOR RELIEF

- 1) That the Court GRANT Mr. Puetz's Claims in their entirety;
- 2) That the Court issue a Permanent Injunction enjoining Teespring, its user(s), their agents, servants, employees, successors, representatives and assigns, and all others in concert and privity with them from infringing Desert Tactical's registered copyright in commerce in any way;
- 3) Teespring identify and enjoin the user responsible for uploading the infringing design to teespring.com.
- 4) Teespring and its user(s) be held jointly and severally accountable to Puetz for damages as a result of the infringement;

- 5) That the Defendant account to Mr. Puetz and that an award of \$150,000 in statutory damages be given to Mr. Puetz for each instance of infringement of Mr. Puetz's copyright occurring on teepsring.com. Statutory damages shall serve to compensate Mr. Puetz for the ongoing damages resulting from the Defendant's willful acts which were committed with knowing disregard of Mr. Puetz's exclusive rights;
- 6) That the Defendant be ordered to surrender all merchandise, printing screens, films, plates, and digital media that contains any form of the Desert Tactical design, reproduction, or design of similarity;
- 7) That the Court order Defendant to pay Mr. Puetz's attorney's fees, together with the cost of this suit; and
- 8) All other and further relief as may be just and equitable.

DATED: SEPTEMBER 27, 2017



/s/ Bradley J. Puetz
Bradley J. Puetz
Desert Tactical
10410 Apples Eye St.
Las Vegas, NV 89131
(702) 701-2878
Brad@deserttactical.com
Plaintiff
Pro Se

EXHIBIT

A

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Registration Number

VA 1-967-093

Effective Date of Registration:

June 07, 2015

Maria A. Pallante

Register of Copyrights, United States of America

Title

Title of Work: I'm the Infidel Allah Warned You About

Completion/Publication

Year of Completion: 2014

Date of 1st Publication: December 01, 2014

Nation of 1st Publication: United States

Author

• Author: Bradley John Puetz
Author Created: 2-D artwork
Citizen of: United States
Domiciled in: United States
Year Born: 1974

Copyright Claimant

Copyright Claimant: Bradley John Puetz
10410 Apples Eye St, Las Vegas, NV, 89131, United States

Rights and Permissions

Organization Name: Desert Tactical
Name: Bradley John Puetz
Email: deserttactical1@aol.com
Telephone: (702)625-3822

Certification

Name: Bradley John Puetz
Date: June 07, 2015

EXHIBIT

B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JUDGE: VINCE CHHABRIA

Case No. 15-CV-4149-VC


CASE NAME: TEESPRING, INC. V. PUETZ

NOTE FROM THE JURY

Note No. DD1
Date 5/9/2017
Time 2:34pm

FILED
MAY 09 2017
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1. The Jury has reached a unanimous verdict ☒
or
2. The Jury has the following question:


Foreperson of the Jury
Jacqueline Sullio

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FILED
MAY 09 2017
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TEESPRING, INC.,
Plaintiff,

v.

BRADLEY JOHN PUETZ,
Defendant.

Case No. 15-cv-04149-VC

BRADLEY JOHN PUETZ,
Counter-Claimant,

v.

TEESPRING, INC.,
Counter-Defendant,
JONATHAN MAGINNIS,
Third-Party Defendant.

VERDICT FORM

Your answer(s) must be unanimous.

We, the jury in this case, find as follows:

1. Did Mr. Puetz prove by a preponderance of the evidence that Mr. Maginnis directly infringed a copyright in the Desert Tactical Design?

☒ Yes

☐ No

If your answer to Question 1 is "No," do not respond to the rest of the questions. The foreperson should sign and date this form and let the Courtroom Deputy know that you have a verdict. If your answer to Question 1 is "Yes," proceed to Question 2.

2. Did Mr. Puetz prove by a preponderance of the evidence that Teespring vicariously infringed a copyright in the Desert Tactical Design?

✓
Yes

No

3. If your answer to Question 1 is "Yes," what were Mr. Maginnis's profits attributable to the infringement, if any?

\$ 385,343.23

4. If your answer to Question 2 is "Yes," what were Teespring's profits attributable to the infringement, if any?

\$ 51,938.60

Dated:

5/9/2017

Jacqueline Sullo
FOREPERSON
Jacqueline Sullo

EXHIBIT

C

File Edit View Favorites Tools Help

http://teepring.com/search?q=alish%20worned

20 Teepring alish worned

Age Family Hobbies Animals Locations Sports Entertainment Names Occasions And Events Jobs 2017 Father's Day Gift Guide Awareness Other Pillows Selected Designs Special Price

Refine By:

Product

- ☐ Tees
- ☐ Long Sleeve
- ☐ Sweatshirt
- ☐ Hoodie
- ☐ Tank Top
- ☐ Hat
- ☐ Kids & Baby
- ☐ Sticker
- ☐ Mug
- ☐ Tote
- ☐ Athletic Apparel
- ☐ Wall Art
- ☐ Home Goods
- ☐ Other

Brand

- ☐ American Apparel
- ☐ Gildan
- ☐ Hanes
- ☐ Teepring
- ☐ Other

30 results for alish worned

I Am The Infidel Alish Worned You A... 527

I Am The Infidel Alish Worned You A... 539

I'm The Infidel Alish Worned You Ab... 522

I'm The Infidel Alish Worned You Ab...

I'm The Infidel Alish Worned You Ab...

I'm The Infidel Alish Worned You Ab...

Star! Designing vegascd@cool.com

SCREEN SHOT CAPTURED
JUNE 14, 2017 AT 13:18 PACIFIC TIME

EXHIBIT

D



Only available for a LIMITED TIME, so get yours TODAY! 100% cotton, printed right here in the U.S.A.

If you buy 2 or more you will save on shipping! Only \$1.00 more per shirt!

***Satisfaction Guaranteed + Safe and Secure**

Internet Exclusive - Available for a few days only

Choose your style and color below

44 30 Day 100% Satisfaction Guaranteed

4.4 Safe & Secure Checkout

6.6 VERY High Quality Hoodies & Tees

4Satisfaction Guaranteed + Safe and Secure

Checkout via PayPal/Visa/Mastercard*

[Show More](#)

Hanes Tagless Tee - \$21.99



Side Chart 2: Product Details

Colors



Buy it now

Last day to order

00 05 18 29
Days Hours Minutes Seconds

EXHIBIT

E

CEASE AND DESIST DEMAND

Pursuant to Title 17 of the United States Code

June 11, 2017

Dear Teespring, Inc.,

We are writing to notify you that your unlawful copying of artwork titled "I'm the Infidel Allah Warned you About" infringes upon our Mr. Puetz's exclusive copyrights. Images and technical aspects of ownership include: Skull design with "Infidel" in Arabic script on the forehead of skull and American flag used as a facemask / cover across front lower part of skull design worn as such a bandana would be worn to cover nose and mouth. Accordingly, you are hereby directed to **IMMEDIATELY**:

CEASE AND DESIST ALL COPYRIGHT INFRINGEMENT.

Mr. Puetz is the lawful registered owner of a copyright in various aspects of "I'm the Infidel Allah Warned you About". Under United States copyright law, Mr. Puetz's copyrights have been in effect since the date that "I'm the Infidel Allah Warned you About" was created. All copyrightable aspects of "I'm the Infidel Allah Warned you About" are copyrighted under United States copyright law. This designs bears the registration number VA 1-967-093. You have been previously sued in the U.S. District Court for Northern California (case no. 3:15-cv-04149-VC) and judgment has been ordered against you. You are not entitled to any further warnings or notices.

It has come to our attention that you have been continuously copying "I'm the Infidel Allah Warned you About". We have copies of your unlawful commercial misappropriation to preserve as evidence. Your actions constitute copyright infringement in violation of United States copyright laws. Under 17 U.S.C. §504, the consequences of copyright infringement include statutory damages of between \$750 and \$30,000 per work, at the discretion of the court, and damages of up to \$150,000 per work for willful infringement. Your continued actions will serve as evidence of "willful infringement".

We demand that you **immediately** (A) cease and desist your unlawful copying of "I'm the Infidel Allah Warned you About" and (B) provide us with prompt written assurance within two (2) days that you will cease and desist from further infringement of Mr. Puetz's copyrighted works.

If you do not comply with this cease and desist demand, Mr. Puetz is entitled to use your failure to comply as evidence of "willful infringement" and seek monetary damages and equitable relief for your copyright infringement. In the event you fail to meet this demand, please be advised that Mr. Puetz **will pursue**

all available legal remedies, including seeking monetary damages, injunctive relief, and an order that you pay court costs and attorney's fees. Your liability and exposure under such legal action could be considerable.

If you or your attorney have any questions, please contact me directly.

Sincerely,

/S/ Bradley J. Puetz

Bradley Puetz

Owner

Desert Tactical.com

Las Vegas, NV 89131

(702) 625-DTAC

EXHIBIT

F

EXHIBIT

G

Shipping Address

[edit](#)

REDACTED

Las Vegas NV 89135-1262

United States

Order Number: 86e0a79d9ccdb78f

Your order will be sent to the printer on or before: **Sun, Sep 10**

Your order will ship by **Tue, Sep 12**

Estimated Arrival: **Thu, Sep 14 - Sat, Sep 16**

[Track My Order](#)



I'm The Infidel

1 L Black Hanes Tagless Tee	edit	\$24.99
Shipping		\$10.98
Sub-total		\$35.97

This order is being custom printed! Please note you only have 2 hours to cancel or modify this order before we begin printing it.

Order Total	\$35.97
--------------------	----------------

EXHIBIT

H

Teespring
1201 Aviation Blvd
Dock - Door 9
Hebron, KY 41048

MAX

23

US Postage
Global Mail
eVS

A25

LAX

3-6

89135

PS LIGHTWEIGHT
ADDRESS SERVICE REQUESTED

REDACTED

REDACTED Sentinel Point Ct
Las Vegas, NV 89135-1262

USPS TRACKING # eVS



9274 8999 9098 7371 2447 62

Ref. 1: ship_1a708ceb5e

J418EE1 / I'm TI:

(C13190452)

Order # ship_1a708ceb5e

Hanes Tagless Tee

Black L / 1

EXHIBIT

I

